

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC., f/k/a )  
HELLER HEALTHCARE FINANCE, )  
INC., )  
 )  
Plaintiff, )  
 )  
And )  
 )  
MICHAEL INGOLDSBY, )  
 )  
Intervenor/Plaintiff, )  
 )  
v. ) Civil Action No. 05-CV-11128-NG  
 )  
NATIONAL UNION FIRE )  
INSURANCE COMPANY OF )  
PITTSBURGH, PA, and )  
INTERNATIONAL INSURANCE )  
GROUP, LTD., )  
 )  
Defendants. )

**DEFENDANT NATIONAL UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, P.A.'S ASSENTED-TO MOTION  
TO CONTINUE THE MEDIATION**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendant National Union Fire Insurance Company of Pittsburgh, P.A. ("National Union"), moves and respectfully requests that the Mediation of this matter, now scheduled for March 9, 2006, at 10:00 a.m. be continued to April 20, 2006. As grounds for this motion the Defendant states:

1. The original date for the Mediation, January 19, 2006, at 10:00 a.m., was continued to March 9, 2006, as counsel for Plaintiff GE HFS was scheduled for trial at that time, and the Intervenor-Defendant and Intervenor-Plaintiff had recently been added to the docket.

2. The Mediation was then continued to March 9, 2006. Not all counsel and parties are available on that date. Counsel to National Union, counsel to Mr. Ingoldsby, and the representative of National Union will be unavailable on March 9, 2006.
3. Defendant has conferred with all counsel for alternate dates and counsel and their clients are available on April 20, 2006.
4. Rescheduling the mediation will not prejudice any party to this matter and would be in the interests of justice.

WHEREFORE, Defendant respectfully requests that the Mediation of this matter be continued to April 20, 2006.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: February 15, 2006

/s/ Mary Patricia Cormier  
John D. Hughes (BBO# 243660)  
Mary Patricia Cormier (BBO# 635756)  
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**RULE 7.1 CERTIFICATE**

I, Mary Patricia Cormier, hereby certify that on this 13th day of February, 2006, I conferred with Jeffrey Francis, counsel for the Plaintiff; Gregory J. Aceto, counsel for the

Intervenor Plaintiff and Richard E. Heifetz, counsel for the Defendant International Insurance Group, LTD all of whom assented to this Motion.

/s/ Mary Patricia Cormier

Mary Patricia Cormier